

**U.S. Department of Justice**



*United States Attorney  
Eastern District of New York*

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EMN  
F.#2002R02513

271 Cadman Plaza East  
Brooklyn, New York 11201

March 9, 2015

**By ECF and Hand**

The Honorable John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Vodicka v. United States  
Miscellaneous Docket No. 15-242 (JG)

Dear Judge Gleeson:

The government respectfully submits this supplemental letter in response to the Court's February 12, 2015 order directing the government to respond to Mr. Vodicka's motion seeking, among other things, to unseal certain documents that remain under seal in United States v. Gennady Klotsman, 02 CR 1313 (ILG) (E.D.N.Y.) (the "2002 Case").

Having now reviewed the balance of the documents reflected on the public docket from the 2002 Case and conferred with counsel for Mr. Klotsman, the government's position with regard to sealing is as follows:

- Docket Entry Nos. 1 (7(b) notice), 3 (waiver of indictment), 4 (calendar entry), 8 (notice of appeal), 10 (mandate), 11 (order), and 12 (letter) can be unsealed, and the government so moves.

The government will be prepared to answer any questions the Court has at the upcoming oral argument on Mr. Vodicka's motion.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

By: \_\_\_\_\_ /s/  
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cc: Clerk of Court (JG) (by ECF)  
Mr. Brian Vodicka (by ECF)  
Alexei Schacht, Esq. (by ECF)